

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

ERNEST FLAGG AS NEXT OF FRIEND OF JONATHAN BOND,

Plaintiff,

Case No.  
05CV74253  
Hon. Gerald Rosen

-vs-

CITY OF DETROIT, a Municipal Corporation, CHIEF OF POLICE ELLA-BULLY CUMMINGS, FORMER POLICE CHIEF, JERRY OLIVER, DEPUTY POLICE CHIEF CARA BEST, MAYOR KWAME KILPATRICK, FORMER CHIEF OF STAFF FOR MAYOR OF CITY OF DETROIT, CHRISTINE BEATTY, MIKE COX, ATTORNEY GENERAL, in his individual capacity.

Defendants, jointly and severally.

**PLAINTIFF 'S ANSWER TO SHOW CAUSE**

NOW COMES PLAINTIFF, ERNEST FLAGG AS NEXT OF FRIEND OF JONATHAN BOND, BY AND THROUGH HIS ATTORNEY, DELICIA COLEMAN  
And states for his answer:

That this Honorable Court should not dismiss defendant, Cara Best, because she is a critical party to this lawsuit because she participated in conspiracy to deny Plaintiff access to courts. Plaintiff has attempted to personally and by certified mail serve

defendant Cara Best who is a retired City of Detroit Police Officer . Because she is a retired Police Officer the City of Detroit could not accept service of process for her as it did for the other defendants. Defendant, Cara Best, lives in a gated community that requires that visitors be announced and approved before entering her neighborhood. Thus the attempts to serve Defendant, Cara Best, has not been successful. However, Plaintiff request the court under Federal Rules of Civil Procedure 4 (m) to extend the time to serve Defendant, Cara Best, for a period of 30 days.

As to Defendant, Jerry Oliver, the plaintiff does not oppose the Court dismissing him as a party to this law suit based on information subsequently obtained since the filing of this action that his participation and state of mind as to the cause of action alleged in the lawsuit.

Respectfully Submitted,



Delicia Coleman P-56278  
Attorney for Plaintiff  
23300 Greenfield Rd., Ste 111  
Oak Park, Michigan 48237  
(248) 967-6293

Dated: August 18, 2006